

Enclosure A:
Instructions

1. Identify the person(s) responding to each question or subpart of a question in this Information Request.
2. Provide a separate narrative response to each and every question and subpart of a question set forth in this Information Request.
3. Precede each answer with the text and the number of the question and its subpart to which the answer corresponds.
4. Each document submitted must contain a notation indicating the question and subpart of the question to which it is responsive.
5. In answering each Information Request question and subpart thereto, identify all documents and persons consulted, examined, or referred to in the preparation of each response and provide true and accurate copies of all such documents.
6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA thereof as soon as possible.
7. Where specific information has not been memorialized in a document, but is nonetheless responsive to a question, respond to the question with a written response.
8. Please provide all information in your possession that is responsive to this Information Request, regardless of whether the response relates to your activities or the activities of another entity.
9. If information responsive to this Information Request is not in your possession, custody, or control, then identify the person(s) from whom such information may be obtained.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
11. Please provide all documents in an electronic format compatible with PDF.

12. Please provide any spreadsheet information in electronic format compatible with MS Excel.
13. If any question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

Enclosure B:
Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act, or its implementing regulations, in which case the statutory or regulatory definitions shall control.
2. The term "Chemours" shall mean the Chemours Company.
3. The term "PFAS" shall mean per- and polyfluoroalkyl substance(s), including, but not limited to: "GenX" compounds (CAS # 13252-13-6, CAS # 62037-80-3, C3 Dimer Acid, C3 Dimer Acid Fluoride, C3 Dimer Acid Ammonium Salt, HFPO-Dimer Acid, HFPO-Dimer Acid Ammonium Salt); Perfluorobutanoate (PFBA); Perfluoro-n-pentanoic acid (PFPeA); Perfluorohexanoic acid (PFHxA); Perfluoroheptanoic acid (PFHpA); Perfluorooctanoic acid (PFOA); Perfluorononanoic acid (PFNA); Perfluorodecanoic acid (PFDA); Perfluoroundecanoic acid (PFUnA); Perfluorododecanoic acid (PFDoA); Perfluorotridecanoic acid (PFTriA); Perfluorotetradecanoic acid (PFTeA); Perfluorobutanesulfonic acid (PFBS); Perfluorohexanesulfonic acid (PFHxS); Perfluorooctanesulfonic acid (PFOS); Perfluorooctanesulfonamide (PFOSA); PFESA Byproduct 1 (CAS # 29311-67-9); PFESA Byproduct 2 (CAS # 749836-20-2); PFMOAA (CAS # 674-13-5); PFO2HxA (CAS # 39492-88-1); PFO3OA (CAS # 39492-89-2).
4. The term "GenX" shall mean the GenX Technology Processing Aid (both the ammonium salt and its free acid version) and the chemicals identified by CAS # 13252-13-6 or CAS # 62037-80-3 or by any one of the following names C3, C3 Dimer Acid, C3 Dimer Acid Fluoride, C3 Dimer Acid Ammonium Salt, HFPO, HFPO-Dimer Acid, HPFO-Dimer Acid Fluoride, HFPO-Dimer Acid Ammonium Salt.
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7. The term "identify" means, with respect to a natural person, to set forth the person's name, job title, position or business, business address and business telephone number.

8. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressee and/or recipient, and substance of the subject matter.
9. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
10. The term "You" and "Your" shall mean Chemours and/or any of its agents, employees or contractors.
11. The term "NPDES" or "NPDES Permit" shall mean the National Pollutant Discharge Elimination System permit issued pursuant to the Clean Water Act.
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Enclosure C:
Confidential Business Information

You may assert a business confidentiality claim covering all or part of the information you provide in response to this Information Request for any business information entitled to confidential treatment under Section 308(b) of the CWA, 33 U.S.C. § 1318, and 40 C.F.R. Part 2, subpart B. Under Section 308(b) of the CWA, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 308(b) of the CWA and 40 C.F.R. Part 2, subpart B. EPA will construe your failure to furnish a business confidentiality claim with your response to this Information Request as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this Information Request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.302. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e), (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, (3) the information is not and has not been reasonably obtainable by legitimate means without your consent, and (4) the disclosure of the information is likely to cause substantial harm to your business competitive edge. *See* 40 C.F.R. §§ 2.208 (a)-(e). Effluent data, as defined at 40 C.F.R. § 2.302(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. *See* 33 U.S.C. § 1318(b); 40 C.F.R. § 2.302(e). If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this Information Request, in accordance with 40 C.F.R. § 2.204(e)(4), the EPA is requesting that you answer the following requests with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are allegedly to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information

subject to your claim.

2. For what period of time do you request that the information be maintained as confidential (*e.g.*, until a certain date, until the occurrence of a specified event, or permanently)? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of that harm, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effect. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding requests? If so, you may provide such additional explanation.

You must furnish comments to the above requests concurrent with your response to this Information Request if you have claimed any information as business confidential. *See* 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline.

The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Jeffrey Speir
Attorney-Adviser
U.S. Environmental Protection Agency
Office of Civil Enforcement
Mail Code 2243-A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these requests, as provided in 40 C.F.R. § 2.203(b). Information covered by such a business confidentiality claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 308(b) of the CWA and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.

Enclosure D:
Information Request Questions

In answering each question below and subpart thereto, identify all documents consulted, examined, or referred to in the preparation of each response and provide true and accurate copies of all such documents. In answering each question below and subpart thereto, identify each PFAS specifically (e.g., PFOA), and not PFAS generally.

1. Identify the person to contact regarding your response, including title, address and phone number.
2. For the Chambers Works facility in New Jersey and its environs, since January 1, 2013, please provide:
 - a. With respect to "DSN 662A" as designated in NPDES Permit NJ0005100, information on GenX in effluent discharged through "DSN 662A" to the Delaware River, including:
 - i. A description of the discharge of any level of GenX through "DSN 662A;"
 - ii. Sampling results showing any level of GenX in the discharge through "DSN 662A;"
 - iii. Monitoring results showing any level of GenX in the discharge through "DSN 662A;" and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of GenX through "DSN 662A."
 - b. With respect to "DSN 002A" as designated in NPDES Permit NJ0005100, information on GenX in effluent discharged through "DSN 002A" to the Delaware River, including:
 - i. A description of the discharge of any level of GenX through "DSN 002A;"
 - ii. Sampling results showing any level of GenX in the discharge through "DSN 002A;"
 - iii. Monitoring results showing any level of GenX in the discharge through "DSN 002A;" and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of GenX through "DSN 002A."
 - c. With respect to "DSN 662A" as designated in NPDES Permit NJ0005100, information on PFAS other than GenX in effluent discharged through "DSN 662A" to the Delaware River, including:
 - i. A description of the discharge of any level of any PFAS through "DSN 662A;"

- ii. Sampling results showing any level of any PFAS in the discharge through “DSN 662A;”
- iii. Monitoring results showing any level of any PFAS in the discharge through “DSN 662A;” and
- iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through “DSN 662A.”

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- d. With respect to “DSN 002A” as designated in NPDES Permit NJ0005100, information on PFAS other than GenX in effluent discharged through “DSN 002A” to the Delaware River, including:
 - i. A description of the discharge of any level of any PFAS through “DSN 002A;”
 - ii. Sampling results showing any level of any PFAS in the discharge through “DSN 002A;”
 - iii. Monitoring results showing any level of any PFAS in the discharge through “DSN 002A;” and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through “DSN 002A.”

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- e. Information on PFAS in effluent discharged through outfalls that discharge non-contact cooling water, contact cooling water, wastewater, stormwater, ground water treatment, groundwater remediation, or sanitary water (i.e., “DSN 001A,” “DSN 013A,” “DSN 322A,” and “Outfall HC01,” as designated in NPDES Permit NJ0005100) to the Delaware River or Henby Creek, including:
 - i. A description of the discharge of any level of any PFAS through such outfalls;
 - ii. Sampling results showing any level of any PFAS in the discharge through such outfalls;
 - iii. Monitoring results showing any level of any PFAS in the discharge through such outfalls; and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through such outfalls.

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- f. Information on whether and how PFAS are discharged, released, spilled, or leaked through pathways not specifically identified in NPDES Permit NJ0005100 (e.g., via channelized stormwater flows, terra cotta pipes, abandoned ditches, unlined former outfalls, erosion channels, or other runoff points) to the Delaware River, including:
- i. A description of the nature of such discharge, release, spill, or leak, containing any level of any PFAS;
 - ii. Sampling results showing any level of any PFAS in such discharges, releases, spills, or leaks;
 - iii. Monitoring results showing any level of any PFAS in such discharges, releases, spills, or leaks; and
 - iv. The starting (and ending, if applicable) dates of discharges, releases, spills, or leaks containing any level of any PFAS.

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- g. Information on whether and how air emissions from the facility contribute to any level of any PFAS in groundwater or surface water.
- h. All analytical results of groundwater samples collected on- and off-site by Chemours for the purpose of determining PFAS contamination, including results from all wells (specifying each individual well), whether or not such well is currently in service.

For each on-site sampling result:

- i. State whether the well was in service at the time of sampling;
- ii. State whether the sample was taken before or after treatment; and
- iii. State whether the sample has been blended with water from a different location or source.

For each off-site sampling result:

- i. State the latitude and longitude or address for each result.

- i. Information on treatment utilized to reduce or eliminate PFAS in groundwater or surface water.
- j. Information on disposal of PFAS to groundwater or surface water.

Message

From: Bates, Keith [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19222721F29B4D969D4F94C22A24A2A7-BATES, KEITH]
Sent: 8/1/2017 2:58:09 PM
To: Lewis, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d10b9dc822484c529c3bc671113b89a1-Lewis, Jennifer]
CC: George, Verne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8d8c394177af44b28b4ce452bccbc851-George, Verne]
Subject: PPVE Process Diagram
Attachments: PPVE Process Diagram.pdf

See attached

Keith Bates
U.S. EPA Region 4
Chemical Management and Emergency Planning Section
61 Forsyth Street, SW
Atlanta, GA 30303

404-562-8992

Message

From: R4-1305-LeX792@epa.gov [R4-1305-LeX792@epa.gov]
Sent: 8/22/2017 3:59:17 PM
To: Lewis, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=d10b9dc822484c529c3bc671113b89a1-Lewis, Jennifer]
Attachments: image2017-08-22-115902.pdf

To: Rangarajan, Banu (USANCE)[Banu.Rangarajan@usdoj.gov]; Blackwell, Jennifer L. (ENRD)[Jennifer.Blackwell2@usdoj.gov]; Kevin LaPointe (LaPointe.Kevin@epa.gov)[LaPointe.Kevin@epa.gov]
Cc: Jodi Mazer (Mazer.Jodi@epa.gov)[Mazer.Jodi@epa.gov]
From: Lewis, Jennifer[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D10B9DC822484C529C3BC671113B89A1-LEWIS, JENNIFER]
Sent: Tue 2/26/2019 3:53:15 PM (UTC)
Subject: Chemours CWA 308s
[2018-11-26 Chemours Information Request Pursuant to CWA 308.pdf](#)
[2018-11-27 Chemours Fayetteville Works CWA 308 Information Request.pdf](#)
[2018-12-27 Chemours Chambers Works CWA 308 Information Request.pdf](#)

Jennifer M. Lewis
Senior Regional Criminal Enforcement Counsel
U.S. EPA, Region 4
Atlanta, GA
Phone: 404-562-9518
Cell: 770-548-7418



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 26 2018

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Mr. Andrew S. Hartten
Principal Project Manager-Corporate Remediation
The Chemours Company
1007 Market Street, #3094
Wilmington, DE 19899

VIA FEDEX

Re: Information Request pursuant to Section 308 of the Clean Water Act

Dear Mr. Hartten:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency hereby requests that the Chemours Company provide the information set forth in Enclosure D ("Information Request Questions"). Chemours is required to respond to this information request within 30 days of physical receipt of this letter. Please direct Chemours' response to:

Charlie A. Collins, II
Environmental Scientist
U.S. Environmental Protection Agency
Office of Civil Enforcement
Mail Code 2243-A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Chemours' response should specifically reference the particular section and item number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible Chemours official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on any personal knowledge I may have and my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

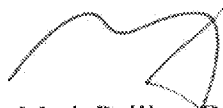
Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

Chemours shall preserve, until further notice, all records (either written or electronic), which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put into place, as required. No such records shall be disposed of until written authorization is received from EPA.

Chemours cannot withhold from EPA what it may consider to be confidential business information. However, Chemours has the discretion to assert, at the time of submission, a claim of business confidentiality for part or all of the requested information by following the requirements at 40 C.F.R. § 2.203(b). EPA will not disclose any information covered by such a claim except as authorized by 40 C.F.R. Part 2, Subpart B. If no claim of business confidentiality is received with Chemours' submission, EPA may make the information available to the public without further notice. All confidentiality claims are subject to EPA verification.

If you have questions regarding this notice and information request, please contact Jeffrey Speir (202-564-0872; speir.jeffrey@epa.gov) or me (202-564-4001; pollins.mark@epa.gov).

Sincerely,



Mark Pollins, Director
Water Enforcement Division
Office of Civil Enforcement

Enclosures

Enclosure A:
Instructions

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9. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
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The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e), (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, (3) the information is not and has not been reasonably obtainable by legitimate means without your consent, and (4) the disclosure of the information is likely to cause substantial harm to your business competitive edge. *See* 40 C.F.R. §§ 2.208 (a)-(e). Effluent data, as defined at 40 C.F.R. § 2.302(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. *See* 33 U.S.C. § 1318(b); 40 C.F.R. § 2.302(e). If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this Information Request, in accordance with 40 C.F.R. § 2.204(e)(4), the EPA is requesting that you answer the following requests with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are allegedly to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information

subject to your claim.

2. For what period of time do you request that the information be maintained as confidential (e.g., until a certain date, until the occurrence of a specified event, or permanently)? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of that harm, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effect. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding requests? If so, you may provide such additional explanation.

You must furnish comments to the above requests concurrent with your response to this Information Request if you have claimed any information as business confidential. *See* 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline.

The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Jeffrey Speir
Attorney-Adviser
U.S. Environmental Protection Agency
Office of Civil Enforcement
Mail Code 2243-A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these requests, as provided in 40 C.F.R. § 2.203(b). Information covered by such a business confidentiality claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 308(b) of the CWA and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.

Enclosure D:
Information Request Questions

In answering each question below and subpart thereto, identify all documents consulted, examined, or referred to in the preparation of each response and provide true and accurate copies of all such documents. In answering each question below and subpart thereto, identify each PFAS specifically (e.g., PFOA), and not PFAS generally.

1. Identify the person to contact regarding your response, including title, address and phone number.
2. Identify all facilities owned and/or operated by Chemours that manufacture, receive, and/or process PFAS.
 - a. For each such facility, identify the specific PFAS that are manufactured, received, and/or processed.
 - b. For each such facility, identify any pollution controls currently installed to treat PFAS.
 - c. For each such facility that receives PFAS, identify the amounts of PFAS that are received.
 - d. For each such facility that receives PFAS, identify the method of transport for such receipt.
3. Identify all facilities, not owned or operated by Chemours, to which Chemours has distributed PFAS for further processing, use, treatment, or disposal.
 - a. For each such facility, identify the specific PFAS that are distributed.
 - b. For each such facility, identify the amounts of PFAS that are distributed.
 - c. For each such facility, identify the method of transport for such distribution.
4. Identify each facility owned and/or operated by Chemours that currently discharges or has discharged, released, spilled, or leaked at any time in the past PFAS to "navigable waters," as that term is defined in Section 502 of the CWA and applicable regulations.
5. Identify all facilities owned and/or operated by Chemours that have NPDES permit conditions for PFAS discharges, NPDES permit limitations for PFAS discharges, or any authorization to discharge PFAS. For each such facility, identify specifically which PFAS are covered by such NPDES permit conditions, NPDES permit limitations, or authorizations to discharge. Further, identify the substantive coverage provided in the NPDES permit conditions, NPDES permit limitations, or authorizations to discharge.

6. For the Washington Works facility in West Virginia and its environs, since January 1, 2013, please provide:
- a. With respect to "Outlet 002" as designated in NPDES Permit WV0001279, information on GenX in effluent discharged through "Outlet 002" to the Ohio River, including:
 - i. A description of the discharge of any level of GenX through "Outlet 002;"
 - ii. Sampling results showing any level of GenX in the discharge through "Outlet 002;"
 - iii. Monitoring results showing any level of GenX in the discharge through "Outlet 002;" and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of GenX through "Outlet 002."
 - b. With respect to "Outlet 005" as designated in NPDES Permit WV0001279, information on GenX in effluent discharged through "Outlet 005" to the Ohio River, including:
 - i. A description of the discharge of any level of GenX through "Outlet 005;"
 - ii. Sampling results showing any level of GenX in the discharge through "Outlet 005;"
 - iii. Monitoring results showing any level of GenX in the discharge through "Outlet 005;" and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of GenX through "Outlet 005."
 - c. With respect to "Outlet 002" as designated in NPDES Permit WV0001279, information on PFAS other than GenX in effluent discharged through "Outlet 002" to the Ohio River, including:
 - i. A description of the discharge of any level of any PFAS through "Outlet 002;"
 - ii. Sampling results showing any level of any PFAS in the discharge through "Outlet 002;"
 - iii. Monitoring results showing any level of any PFAS in the discharge through "Outlet 002;" and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through "Outlet 002."

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.
 - d. With respect to "Outlet 005" as designated in NPDES Permit WV0001279, information on PFAS other than GenX in effluent discharged through "Outlet 005" to the Ohio River, including:

- i. A description of the discharge of any level of any PFAS through "Outlet 005;"
- ii. Sampling results showing any level of any PFAS in the discharge through "Outlet 005;"
- iii. Monitoring results showing any level of any PFAS in the discharge through "Outlet 005;" and
- iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through "Outlet 005."

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- e. Information on PFAS in effluent discharged through outlets that discharge non-contact cooling water, stormwater, groundwater, wastewater, or pump seal water (i.e., "Outlet 001," "Outlet 003," "Outlet 006," "Outlet 007," "Outlet 011," "Outlet 013," "Outlet 016," "Outlet 019," "Outlet 022," "Outlet 023," "Outlet 025," "Outlet 026," "Outlet 028," "Outlet 030," "Outlet 031," "Outlet 032," "Outlet 033," "Outlet 034" and "Outlet 036," as designated in NPDES Permit WV0001279) to the Ohio River, Page Run, or Coal Hollow, including:
 - i. A description of the discharge of any level of any PFAS through such outlets;
 - ii. Sampling results showing any level of any PFAS in the discharge through such outlets;
 - iii. Monitoring results showing any level of any PFAS in the discharge through such outlets; and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through such outlets.

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- f. Discharge Monitoring Reports showing any level of any PFAS in effluent discharged from any outlet at the facility.
- g. Information on whether and how PFAS are discharged, released, spilled, or leaked through pathways not specifically identified in NPDES Permit WV0001279 (e.g., via channelized stormwater flows, terra cotta pipes, abandoned ditches, unlined former outfalls, erosion channels, or other runoff points) to the Ohio River, Page Run, or Coal Hollow, including:
 - i. A description of the nature of such discharge, release, spill, or leak, containing any level of any PFAS;
 - ii. Sampling results showing any level of any PFAS in such discharges, releases, spills, or leaks;

- iii. Monitoring results showing any level of any PFAS in such discharges, releases, spills, or leaks; and
- iv. The starting (and ending, if applicable) dates of discharges, releases, spills, or leaks containing any level of any PFAS.

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- h. Information on whether and how air emissions from the facility contribute to any level of any PFAS in groundwater or surface water, including reports of sampling provided to the West Virginia Department of Environmental Protection.
- i. All analytical results of groundwater samples collected on- and off-site by Chemours for the purpose of determining PFAS contamination, including results from all wells (specifying each individual well), whether or not such well is currently in service.

For each on-site sampling result:

- i. State whether the well was in service at the time of sampling;
- ii. State whether the sample was taken before or after treatment; and
- iii. State whether the sample has been blended with water from a different location or source.

For each off-site sampling result:

- i. State the latitude and longitude or address for each result.
- j. Information on treatment utilized to reduce or eliminate PFAS in groundwater or surface water.
- k. Information on disposal of PFAS to groundwater or surface water.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 27 2018

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Mr. Andrew S. Hartten
Principal Project Manager-Corporate Remediation
The Chemours Company
1007 Market Street, #3094
Wilmington, DE 19899

Re: Information Request pursuant to Section 308 of the Clean Water Act

Dear Mr. Hartten:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency hereby requests that the Chemours Company provide the information set forth in Enclosure D ("Information Request Questions"). Chemours is required to respond to this information request within 30 days of receipt of this letter. Please direct Chemours' response to:

Charlie A. Collins, II
Environmental Scientist
U.S. Environmental Protection Agency
Office of Civil Enforcement
Mail Code 2243-A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Chemours' response should specifically reference the particular section and item number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible Chemours official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on any personal knowledge I may have and my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

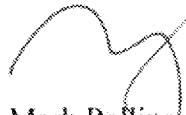
Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

Chemours shall preserve, until further notice, all records (either written or electronic), which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put into place, as required. No such records shall be disposed of until written authorization is received from EPA.

Chemours cannot withhold from EPA what it may consider to be confidential business information. However, Chemours has the discretion to assert, at the time of submission, a claim of business confidentiality for part or all of the requested information by following the requirements at 40 C.F.R. § 2.203(b). EPA will not disclose any information covered by such a claim except as authorized by 40 C.F.R. Part 2, Subpart B. If no claim of business confidentiality is received with Chemours' submission, EPA may make the information available to the public without further notice. All confidentiality claims are subject to EPA verification.

If you have questions regarding this notice and information request, please contact Jeffrey Speir (202-564-0872; speir.jeffrey@epa.gov) or me (202-564-4001; pollins.mark@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Pollins', is written over a horizontal line.

Mark Pollins, Director
Water Enforcement Division
Office of Civil Enforcement

Enclosures

Enclosure A:
Instructions

1. Identify the person(s) responding to each question or subpart of a question in this Information Request.
2. Provide a separate narrative response to each and every question and subpart of a question set forth in this Information Request.
3. Precede each answer with the text and the number of the question and its subpart to which the answer corresponds.
4. Each document submitted must contain a notation indicating the question and subpart of the question to which it is responsive.
5. In answering each Information Request question and subpart thereto, identify all documents and persons consulted, examined, or referred to in the preparation of each response and provide true and accurate copies of all such documents.
6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA thereof as soon as possible.
7. Where specific information has not been memorialized in a document, but is nonetheless responsive to a question, respond to the question with a written response.
8. Please provide all information in your possession that is responsive to this Information Request, regardless of whether the response relates to your activities or the activities of another entity.
9. If information responsive to this Information Request is not in your possession, custody, or control, then identify the person(s) from whom such information may be obtained.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
11. Please provide all documents in an electronic format compatible with PDF.

12. Please provide any spreadsheet information in electronic format compatible with MS Excel.
13. If any question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

Enclosure B:
Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act, or its implementing regulations, in which case the statutory or regulatory definitions shall control.
2. The term "Chemours" shall mean the Chemours Company.
3. The term "PFAS" shall mean per- and polyfluoroalkyl substance(s), including, but not limited to: "GenX" compounds (CAS # 13252-13-6, CAS # 62037-80-3, C3 Dimer Acid, C3 Dimer Acid Fluoride, C3 Dimer Acid Ammonium Salt, HFPO-Dimer Acid, HFPO-Dimer Acid Ammonium Salt); Perfluorobutanoate (PFBA); Perfluoro-n-pentanoic acid (PFPeA); Perfluorohexanoic acid (PFHxA); Perfluoroheptanoic acid (PFHpA); Perfluorooctanoic acid (PFOA); Perfluorononanoic acid (PFNA); Perfluorodecanoic acid (PFDA); Perfluoroundecanoic acid (PFUnA); Perfluorododecanoic acid (PFDoA); Perfluorotridecanoic acid (PFTriA); Perfluorotetradecanoic acid (PFTeA); Perfluorobutanesulfonic acid (PFBS); Perfluorohexanesulfonic acid (PFHxS); Perfluorooctanesulfonic acid (PFOS); Perfluorooctanesulfonamide (PFOSA); PFESA Byproduct 1 (CAS # 29311-67-9); PFESA Byproduct 2 (CAS # 749836-20-2); PFMOAA (CAS # 674-13-5); PFO2HxA (CAS # 39492-88-1); PFO3OA (CAS # 39492-89-2).
4. The term "GenX" shall mean the GenX Technology Processing Aid (both the ammonium salt and its free acid version) and the chemicals identified by CAS # 13252-13-6 or CAS # 62037-80-3 or by any one of the following names C3, C3 Dimer Acid, C3 Dimer Acid Fluoride, C3 Dimer Acid Ammonium Salt, HFPO, HFPO-Dimer Acid, HPFO-Dimer Acid Fluoride, HFPO-Dimer Acid Ammonium Salt.
5. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
6. The term "discharge" or "discharge of pollutants" shall mean any action within the meaning of these terms, as defined at Section 502 of the CWA, 33 U.S.C. § 1362, and all regulations promulgated thereunder.
7. The term "identify" means, with respect to a natural person, to set forth the person's name, job title, position or business, business address and business telephone number.

8. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressee and/or recipient, and substance of the subject matter.
9. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
10. The term "You" and "Your" shall mean Chemours and/or any of its agents, employees or contractors.
11. The term "NPDES" or "NPDES Permit" shall mean the National Pollutant Discharge Elimination System permit issued pursuant to the Clean Water Act.
12. The term "stormwater" shall mean stormwater runoff, snow melt runoff, and surface runoff and drainage.

Enclosure C:
Confidential Business Information

You may assert a business confidentiality claim covering all or part of the information you provide in response to this Information Request for any business information entitled to confidential treatment under Section 308(b) of the CWA, 33 U.S.C. § 1318, and 40 C.F.R. Part 2, subpart B. Under Section 308(b) of the CWA, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 308(b) of the CWA and 40 C.F.R. Part 2, subpart B. EPA will construe your failure to furnish a business confidentiality claim with your response to this Information Request as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this Information Request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.302. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e), (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, (3) the information is not and has not been reasonably obtainable by legitimate means without your consent, and (4) the disclosure of the information is likely to cause substantial harm to your business competitive edge. *See* 40 C.F.R. §§ 2.208 (a)-(e). Effluent data, as defined at 40 C.F.R. § 2.302(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. *See* 33 U.S.C. § 1318(b); 40 C.F.R. § 2.302(e). If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this Information Request, in accordance with 40 C.F.R. § 2.204(e)(4), the EPA is requesting that you answer the following requests with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are allegedly to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information

subject to your claim.

2. For what period of time do you request that the information be maintained as confidential (*e.g.*, until a certain date, until the occurrence of a specified event, or permanently)? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of that harm, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effect. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding requests? If so, you may provide such additional explanation.

You must furnish comments to the above requests concurrent with your response to this Information Request if you have claimed any information as business confidential. *See* 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline.

The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Jeffrey Speir
Attorney-Adviser
U.S. Environmental Protection Agency
Office of Civil Enforcement
Mail Code 2243-A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these requests, as provided in 40 C.F.R. § 2.203(b). Information covered by such a business confidentiality claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 308(b) of the CWA and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.

Enclosure D:
Information Request Questions

In answering each question below and subpart thereto, identify all documents consulted, examined, or referred to in the preparation of each response and provide true and accurate copies of all such documents. In answering each question below and subpart thereto, identify each PFAS specifically (e.g., PFOA), and not PFAS generally.

1. Identify the person to contact regarding your response, including title, address and phone number.
2. For the Chambers Works facility in New Jersey and its environs, since January 1, 2013, please provide:
 - a. With respect to "DSN 662A" as designated in NPDES Permit NJ0005100, information on GenX in effluent discharged through "DSN 662A" to the Delaware River, including:
 - i. A description of the discharge of any level of GenX through "DSN 662A;"
 - ii. Sampling results showing any level of GenX in the discharge through "DSN 662A;"
 - iii. Monitoring results showing any level of GenX in the discharge through "DSN 662A;" and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of GenX through "DSN 662A."
 - b. With respect to "DSN 002A" as designated in NPDES Permit NJ0005100, information on GenX in effluent discharged through "DSN 002A" to the Delaware River, including:
 - i. A description of the discharge of any level of GenX through "DSN 002A;"
 - ii. Sampling results showing any level of GenX in the discharge through "DSN 002A;"
 - iii. Monitoring results showing any level of GenX in the discharge through "DSN 002A;" and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of GenX through "DSN 002A."
 - c. With respect to "DSN 662A" as designated in NPDES Permit NJ0005100, information on PFAS other than GenX in effluent discharged through "DSN 662A" to the Delaware River, including:
 - i. A description of the discharge of any level of any PFAS through "DSN 662A;"

- ii. Sampling results showing any level of any PFAS in the discharge through “DSN 662A;”
- iii. Monitoring results showing any level of any PFAS in the discharge through “DSN 662A;” and
- iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through “DSN 662A.”

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- d. With respect to “DSN 002A” as designated in NPDES Permit NJ0005100, information on PFAS other than GenX in effluent discharged through “DSN 002A” to the Delaware River, including:
 - i. A description of the discharge of any level of any PFAS through “DSN 002A;”
 - ii. Sampling results showing any level of any PFAS in the discharge through “DSN 002A;”
 - iii. Monitoring results showing any level of any PFAS in the discharge through “DSN 002A;” and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through “DSN 002A.”

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- e. Information on PFAS in effluent discharged through outfalls that discharge non-contact cooling water, contact cooling water, wastewater, stormwater, ground water treatment, groundwater remediation, or sanitary water (i.e., “DSN 001A,” “DSN 013A,” “DSN 322A,” and “Outfall HC01,” as designated in NPDES Permit NJ0005100) to the Delaware River or Henby Creek, including:
 - i. A description of the discharge of any level of any PFAS through such outfalls;
 - ii. Sampling results showing any level of any PFAS in the discharge through such outfalls;
 - iii. Monitoring results showing any level of any PFAS in the discharge through such outfalls; and
 - iv. A description of the starting (and ending, if applicable) dates of discharge of any level of any PFAS through such outfalls.

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- f. Information on whether and how PFAS are discharged, released, spilled, or leaked through pathways not specifically identified in NPDES Permit NJ0005100 (e.g., via channelized stormwater flows, terra cotta pipes, abandoned ditches, unlined former outfalls, erosion channels, or other runoff points) to the Delaware River, including:
- i. A description of the nature of such discharge, release, spill, or leak, containing any level of any PFAS;
 - ii. Sampling results showing any level of any PFAS in such discharges, releases, spills, or leaks;
 - iii. Monitoring results showing any level of any PFAS in such discharges, releases, spills, or leaks; and
 - iv. The starting (and ending, if applicable) dates of discharges, releases, spills, or leaks containing any level of any PFAS.

For each answer to subquestion i. through subquestion iv., above, specify the particular PFAS analyte identified and, for subquestion ii. and subquestion iii., the resulting level measured or detected.

- g. Information on whether and how air emissions from the facility contribute to any level of any PFAS in groundwater or surface water.
- h. All analytical results of groundwater samples collected on- and off-site by Chemours for the purpose of determining PFAS contamination, including results from all wells (specifying each individual well), whether or not such well is currently in service.

For each on-site sampling result:

- i. State whether the well was in service at the time of sampling;
- ii. State whether the sample was taken before or after treatment; and
- iii. State whether the sample has been blended with water from a different location or source.

For each off-site sampling result:

- i. State the latitude and longitude or address for each result.

- i. Information on treatment utilized to reduce or eliminate PFAS in groundwater or surface water.
- j. Information on disposal of PFAS to groundwater or surface water.

Message

From: Lewis, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D10B9DC822484C529C3BC671113B89A1-LEWIS, JENNIFER]
Sent: 8/1/2017 3:09:29 PM
To: Kevin LaPointe (LaPointe.Kevin@epa.gov) [LaPointe.Kevin@epa.gov]
Subject: FW: PPVE Process Diagram
Attachments: PPVE Process Diagram.pdf

FYI

Jennifer M. Lewis
Senior Regional Criminal Enforcement Counsel
US EPA Region 4
Atlanta Federal Center
61 Forsyth St. SW
Atlanta, GA 30303
404-562-9518

From: Bates, Keith
Sent: Tuesday, August 01, 2017 10:58 AM
To: Lewis, Jennifer <Lewis.Jennifer@epa.gov>
Cc: George, Verne <George.Verne@epa.gov>
Subject: PPVE Process Diagram

See attached

Keith Bates
U.S. EPA Region 4
Chemical Management and Emergency Planning Section
61 Forsyth Street, SW
Atlanta, GA 30303

404-562-8992

Organizer: Behl, Betsy[Behl.Betsy@epa.gov]
From: Behl, Betsy
Location: CALL IN: CONF ID:
Importance: Normal
Subject: discuss GenX project
Start Time: Mon 3/26/2018 2:00:00 PM
End Time: Mon 3/26/2018 3:00:00 PM
Required Attendees: mina.shehee@dhhs.nc.gov; Elizabeth Dittman; Strong, Jamie;
sandy.mort@ncdenr.gov; connie.brower@ncdenr.gov
Optional Attendees: Gillespie, Andrew; Jacobs, Brittany; Miller, Gregory; Allenbach, Becky; Mitchell,
Ken; Adams, Glenn; Pritchett, Jamie R

Organizer: Behl, Betsy[Behl.Betsy@epa.gov]
From: Behl, Betsy
Location: CALL IN:

Conference Line / Ex. 6

 CONF ID:

Personal Phone / Ex. 6

Importance: Normal
Subject: discuss GenX project
Start Time: Mon 3/26/2018 2:00:00 PM
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ECOS FED PART GENX PFBS PRESENTATION 03 06 18.pptx
GENX BIBLIO 03 02 18.docx

Looking forward to our conversation on Monday. I have attached above the problem formulation for GenX and our bibliography that we shared with a state group identified by ECOS for us to coordinate with.

Best, Betsy

To: mina.shehee@dhhs.nc.gov[mina.shehee@dhhs.nc.gov]; Elizabeth Dittman[Beth.Dittman@dhhs.nc.gov]
Cc: Strong, Jamie[Strong.Jamie@epa.gov]; Gillespie, Andrew[Gillespie.Andrew@epa.gov]; Vandenberg, John[Vandenberg.John@epa.gov]
From: Behl, Betsy[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D17D5A871E0244869EA996A9DE657BCF-BETSY BEHL]
Sent: Thur 3/22/2018 4:26:24 PM (UTC)
Subject: coordinating on GenX toxicity assessment

Dear Mina,

Thanks very much for the quick call this afternoon. Just within the last week EPA announced that we are developing toxicity values for GenX and PFBS, with additional PFAS to come. We are planning to have the GenX assessment completed by the end of July. We understand from John’s work with the NC SAP that we are in roughly the same place, looking at data and scoping out the GenX assessment. We have completed some BMD modeling, and are interested in your perspectives on the scope of that modeling. We look forward to discussing this in more detail on Monday with you and your toxicologists and to coordinating our work on the GenX assessment.

Best, Betsy

Elizabeth (Betsy) Behl, Director
Health and Ecological Criteria Division, 4304-T
Office of Science and Technology, Office of Water
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460

phone: 202.566.0788
room 5233H

To: Crofton, Kevin[Crofton.Kevin@epa.gov]; Houck, Keith[Houck.Keith@epa.gov]; Strynar, Mark[strynar.mark@epa.gov]; Buckley, Timothy[Buckley.Timothy@epa.gov]; amy.risen@dhhs.nc.gov[amy.risen@dhhs.nc.gov]; Koporec, Kevin[Koporec.Kevin@epa.gov]; Thomas, Brett[Thomas.Brett@epa.gov]
Cc: Guiseppi-Elie, Annette[Guiseppi-Elie.Annette@epa.gov]; Jennifer Orme-Zavaleta[Orme-Zavaleta.Jennifer@epa.gov]
From: Gillespie, Andrew[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DCE99ECE87694A06B3009D7756E2A89E-GILLESPIE, ANDREW]
Sent: Thur 9/21/2017 8:22:15 PM (UTC)
Subject: outline of study plan - bioassay tests on cape fear river samples containing PFCs
[Study Plan Outline.docx](#)
[NCDEQ Cape Fear Water Samples.xlsx](#)

Colleagues - attached is a summary and first rough cut plan for a potential bioassay study using the concentrated water samples from the cape fear river collected by DEQ and analyzed by EPA/NERL.

The spreadsheet is a summary of available samples, with a little bit of available concentration data for two sites.

Please look it over and send me any comments, corrections, revisions, etc.

In particular, from NCCT it would be good to know if this is enough information to propose how many and which samples to use for the bioassay work, or if more information or discussion is needed.

Thanks, Andy

Andrew J. R. Gillespie, Ph. D.
Associate Director
US EPA/ORD/NERL